

board bill. It is inconceivable that an ordinary business man would give credit on the faith of such a statement without inquiring who the party is who is to make the remittance, and that is what the manager of the hotel in this case did. Hence all the elements of the crime charged against defendant are lacking. Her representation, if false at all, was of a future event, and the manager of the hotel did not credit her for board on the faith of it.—Missouri Supreme Court, Feb. 2, 1892. *State v. Kingsley*.

THE LATE LORD BRAMWELL.

Of the late Lord Bramwell, whose death was recently noticed, the English legal journals speak in terms of highest praise. The *Law Journal* says:—"Lord Bramwell will be universally regretted by the profession and the public. After a judicial career of the unprecedented length of thirty-six years (for though he nominally retired in 1881, his honorary services in the House of Lords were so constant and continuous that he may be said to have died a judge) he has literally died in harness, being cut off at the age of eighty-three, within a very short period after the delivery of his latest judgment. As a specialist he was both the best criminal lawyer and the best commercial lawyer of his day (an unexampled combination of excellences), while his judgments on all points that came before him were distinguished by a rare good sense and independence of view, for he frequently differed from his colleagues. He was proud, but justly proud of his legal knowledge. Perhaps he leaned a little too much to the legal as distinguished from the equitable view of a question, and was a little too quick to see the weak points of a plaintiff when a railway company happened to be defendants. But he has left a good and indelible mark on English law."

The *Law Times* has the following:—"The late Lord Bramwell, best known to the public as Baron Bramwell—to the bar as "Brammy"—was one of the ablest and the most popular of English judges of any generation. We have before said that we hesitate to inquire into the precise qualifications which go to make clever, able and great men. But we unhesitatingly put the late lord among the category of England's best and greatest judges. Mr. George Meredith, in one of his recent works of fiction, says that immortality consists in what we do, not in what we are. This applies with great force to judges. A judge, against